

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robert J. Feinstein, Esq. (admitted *pro hac vice*)
Bradford J. Sandler, Esq.
Paul J. Labov, Esq.
Edward A. Corma, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
1700 Broadway, 36th Floor
New York, NY 10019
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: rfeinstein@pszjlaw.com
bsandler@pszjlaw.com
plabov@pszjlaw.com
ecorma@pszjlaw.com

Counsel to the Plan Administrator

In re:

BED BATH & BEYOND INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**ORDER SUSTAINING PLAN ADMINISTRATOR'S
EIGHTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CLAIMS
(Equity Claims)**

The relief set forth on the following pages, numbered two (2) through four (4), is
ORDERED.

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtor's proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

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Debtors: BED BATH & BEYOND INC., *et al.*
Case No. 23-13359-VFP
Caption of Order: ORDER SUSTAINING PLAN ADMINISTRATOR'S EIGHTEENTH
OMNIBUS OBJECTION (SUBSTANTIVE) TO CLAIMS (Equity
Claims)

Upon the objection (the "Objection")² of the Plan Administrator, pursuant to sections 105 and 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1, 3007-2, and 9013-1, objecting to the claims identified on the attached **Exhibit 1** (the "Disputed Claims"); and upon consideration of the record of these chapter 11 cases and the *Declaration of Michael Goldberg*; and the Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court; consideration of the Objection and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Debtors' estates, their creditors and all parties in interest, and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. The Objection is sustained.
2. Each Disputed Claim set forth on Exhibit 1 is an "Interest" in BBB as defined by section 101(16) of the Bankruptcy Code and Article I.A.87 of the *Second Amended Joint Chapter 11 Plan of Bed Bath & Beyond Inc. and Its Debtor Affiliates* [Docket No. 2160] (the "Plan").
3. Each Disputed Claim set forth on Exhibit 1 is reclassified as a Class 9 Interest

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

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pursuant to the Article III.B.9(a) of the Plan.

4. Each Disputed Claim set forth on Exhibit 1 will be treated as a Class 9 Interest pursuant to the Plan, which provides, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Plan, Article III.B(9).

5. The Claims and Noticing Agent is authorized to modify the Claims Register to reflect the relief granted by this Order.

6. Nothing in this Order shall affect any party's rights with respect to the Disputed Claims as reclassified, and all parties' rights with respect to such claims are reserved, including, for the avoidance of doubt, the Plan Administrator's or any estate representative's rights to object in the future to any Disputed Claim on any grounds permitted by bankruptcy or nonbankruptcy law.

7. Nothing in this Order shall be deemed (i) an admission as to the validity of any claim or as an allowance of any claim; (ii) a waiver of the Debtors' or Plan Administrator's rights to dispute any claim or interest, including the Disputed Claims set forth on **Exhibit 1** hereto, on any grounds, including, but not limited to, pursuant to section 502(d) of the Bankruptcy Code; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any claim is of a type referenced or defined in this Objection; (v) a waiver or limitation of any of the Debtors' or Plan Administrator's rights under the Plan, the Bankruptcy Code, or applicable law; or (vi) a waiver of any other substantive objection to the Disputed

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Claims)

Claims.

8. Each Disputed Claim and the objections by the Plan Administrator thereto, as set forth on **Exhibit 1** hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007. This Order shall be deemed a separate Order with respect to each such Disputed Claim. Any stay of this Order pending appeal by any Claimant whose claim is subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

9. Notwithstanding any applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules, this Order shall be effective immediately upon its entry.

10. The Court shall retain jurisdiction to construe and enforce this Order.

Exhibit 1 to Exhibit A

List of Disputed Claims

#	Name of Claimant	Date Claim Filed	Claim Number	Debtor Name	Asserted Claim Amount		Grounds for Objection & Disposition of Objection is Granted
					Claim Nature	Claim Amount	
1	Asmailzada, Razaq	11/11/2023	18352	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$0.00 \$0.00 \$0.00 \$101,000.00 \$0.00 \$101,000.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
2	Asmailzada, Razaq	12/5/2023	18817	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$0.00 \$0.00 \$0.00 \$101,000.00 \$0.00 \$101,000.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
3	Babatunde, Omosholape David	11/6/2023	18274	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$28,515.00 \$16,700.00 \$28,515.00 \$28,515.00 \$0.00 \$102,245.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
4	Brainard, Jessica Lynn	5/16/2023	1468	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$0.00 \$0.00 \$0.00 \$27.93 \$0.00 \$27.93	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
5	Francis, Henish	8/28/2023	16644	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$2,566.00 \$0.00 \$0.00 \$0.00 \$2,566.00 \$5,132.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
6	Jung, Yun Gi	8/30/2023	16726	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$16,318.08 \$0.00 \$0.00 \$0.00 \$0.00 \$16,318.08	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
7	Khatun, Junni Ara	10/20/2023	17987	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$3,633.00 \$0.00 \$0.00 \$0.00 \$0.00 \$3,633.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
8	Kumari, Chanda	6/26/2023	6920	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$0.00 \$0.00 \$0.00 \$2,000.00 \$0.00 \$2,000.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
9	Kundu, Aniruddha	8/29/2023	16696	Bed Bath & Beyond Inc.	Secured Admin 503(b)(9) Priority GUC Total	\$15,000.00 \$0.00 \$0.00 \$0.00 \$0.00 \$15,000.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.

#	Name of Claimant	Date Claim Filed	Claim Number	Debtor Name	Asserted Claim Amount		Grounds for Objection & Dispositiion of Objection is Granted
10	Martin, Clay	9/12/2024	20298	Bed Bath & Beyond Inc.	Secured	\$0.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
					Admin	\$0.00	
					503(b)(9)	\$0.00	
					Priority	\$2,257.33	
					GUC	\$0.00	
					Total	\$2,257.33	
11	Proce, Peter	4/22/2025	20713	Bed Bath & Beyond Inc.	Secured	\$0.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
					Admin	\$0.00	
					503(b)(9)	\$228,006.00	
					Priority	\$0.00	
					GUC	\$0.00	
					Total	\$228,006.00	
12	Shahiduzzaman, Mohammad	10/20/2023	17986	Bed Bath & Beyond Inc.	Secured	\$9,842.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
					Admin	\$0.00	
					503(b)(9)	\$0.00	
					Priority	\$0.00	
					GUC	\$9,842.00	
					Total	\$19,684.00	
13	Volikov, Andrei Alexandrovich	8/23/2023	16500	Bed Bath & Beyond Inc.	Secured	\$0.00	The Disputed Claim is based on Claimant's alleged equity interest in Bed Bath & Beyond, Inc.. Pursuant to Article III.B(9) of the Plan, "Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests." Accordingly, the Plan Administrator asks the Court to (1) classify the Disputed Claim as a "Class 9 Interest" and (2) in accordance with the Plan, hold that Claimant is not entitled to any recovery or distribution under the Plan on account of such Interest.
					Admin	\$0.00	
					503(b)(9)	\$0.00	
					Priority	\$4,972.36	
					GUC	\$0.00	
					Total	\$4,972.36	